## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

## UNITED STATES OF AMERICA,

Plaintiff, No. 1:20-cr-183

v. Hon. Robert J. Jonker Chief U.S. District Judge

ADAM DEAN FOX, BARRY GORDON CROFT, JR., DANIEL JOSEPH HARRIS, and BRANDON MICHAEL-RAY CASERTA,

Defendants.	

## GOVERNMENT'S REVISED PROPOSED EXHIBIT LIST

The government submits the revised proposed exhibit list included below. The government respectfully requests the opportunity to offer additional exhibits and renumber exhibits, if necessary.

- 1. Facebook certification of records
- 2. January 2020 Fox Facebook photo
- 3. March 2020 Fox Facebook video
- 4. April 2020 Croft Facebook post
- 5. Picture of Fox at Michigan Capitol
- 6. April 2020 Fox Facebook video
- 7. Picture of Wolverine Watchmen
- 8.
- 9. May 1, 2020 Wire chat
- 10. May 1, 2020 Wire chat
- 11. May 2020 Croft Facebook chat
- 12. May 2020 Croft Facebook chat
- 13. May 2020 Croft Facebook chat
- 14. May 2020 Croft Facebook voice message
- 15. May 2020 Croft Facebook voice message
- 16. May 2020 Croft Facebook chat
- 17. May 12, 2020 Fox Facebook video
- 18. May 16, 2020 Fox Facebook post
- 19. May 16, 2020 Harris Facebook message
- 20. May 19, 2020 Fox Facebook voice message
- 21. May 22, 2020 Facebook post
- 22. May 29, 2020 Fox Facebook video

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23. May 30, 2020 Fox Facebook voice message
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- 24. May 31, 2020 Fox Facebook voice message
- 25. June 2, 2020 Fox Facebook voice message
- 26. June 3, 2020 recording
- 27. June 3, 2020 recording
- 28. June 3, 2020 recording
- 29. June 3, 2020 recording
- 30. June 3, 2020 recording
- 31. June 4, 2020 Fox Facebook video
- 32. June 4, 2020 Croft Facebook post
- 33. June 5, 2020 Fox Facebook post
- 34. June 6, 2020 recording
- 35. June 6, 2020 recording
- 36. June 6, 2020 recording
- 37. June 6, 2020 recording
- 38.
- 39. June 6, 2020 recording
- 40. June 6, 2020 recording
- 41. June 6, 2020 recording
- 42. Picture of Croft and Fox
- 43. June 8, 2020 Fox Facebook message
- 44. June 8, 2020 Fox Facebook voice message
- 45. June 8, 2020 Fox Facebook voice message
- 46. June 8, 2020 Fox Facebook voice message
- 47. June 8, 2020 Fox Facebook video
- 48. Facebook photo of Croft
- 49. Facebook photo of Croft
- 50. June 9, 2020 Croft Facebook chat
- 51. June 9, 2020 Fox Facebook video
- 52. June 9, 2020 Croft Facebook voice message
- 53. June 10, 2020 Fox Facebook voice message
- 54. June 10, 2020 Fox Facebook voice message
- 55. June 13, 2020 Fox Facebook voice message
- 56. Training schedule
- 57. June 14, 2020 recording
- 58. June 18, 2020 picture of Fox
- 59. June 18, 2020 picture of Harris
- 60. Vac Shack picture
- 61. Vac Shack picture
- 62. Vac Shack picture
- 63. Digital scan video of Vac Shack
- 64. June 20, 2020 recording
- 65. June 20, 2020 recording
- 66. June 20, 2020 recording
- 67.
- 68. June 21, 2020 Fox Facebook voice message

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69.
          June 25, 2020 Fox Facebook video
70.
          June 27, 2020 Fox Facebook video
71.
          June 29, 2020 Facebook message
72.
          July 3, 2020 recording
          July 3, 2020 recording
73.
74.
          July 3, 2020 recording
          July 3, 2020 recording
75.
76.
          July 3, 2020 recording
77.
          July 7, 2020 recording
78.
          Typed codewords
79.
80.
          July 7, 2020 recording
          July 10, 2020 recording
81.
          July 10, 2020 recording
82.
          July 10, 2020 recording
83.
84.
          July 10, 2020 recording
85.
          July 10, 2020 recording
          July 10, 2020 recording
86.
87.
          July 10, 2020 recording
88.
          Dino's picture
          July 11, 2020 picture at Cambria FTX
89.
90.
91.
          Picture of Croft with Boogaloo flag
92.
          July 11, 2020 recording
          July 11, 2020 recording
93.
94.
          July 11, 2020 recording
          Picture of Croft with tactical gear
95.
          July 11, 2020 recording
96.
97.
          July 11, 2020 picture of IED
98.1
          July 11, 2020 video of IED
          July 11, 2020 video of IED
98.2
          July 11, 2020 video
99.
          July 11, 2020 recording
100.
          July 11, 2020 recording
101.
102.
          July 11, 2020 recording
103.
          July 11, 2020 video at Cambria FTX
104.
          July 11, 2020 video at Cambria FTX
105.1
          July 11, 2020 video at Cambria FTX
105.2
          July 11, 2020 video at Cambria FTX
          July 12, 2020 recording
106.
          July 12, 2020 recording
107.
108.
          July 12, 2020 recording
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111. Sign-in sheet

109. 110.

112. July 14, 2020 recording

July 12, 2020 recording

July 12, 2020 recording

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113.
         July 18, 2020 recording
114.
         July 17, 2020 Croft Facebook messages
115.
         July 18, 2020 recording
116.
         July 18, 2020 recording
117.
118.
         July 19, 2020 Wire chat
119.
         July 19, 2020 Wire chat
         July 22, 2020 Fox Facebook message
120.
121.
         July 23, 2020 recording
122.
         July 24, 2020 recording
123.
         July 24, 2020 recording
         July 26, 2020 Fowlerville FTX video
124.
         July 26, 2020 Fowlerville FTX video
125.
126.
         July 26, 2020 Fowlerville FTX video
         July 27, 2020 recording
127.
128.
         July 27, 2020 recording
129.
         July 28, 2020 Franks and Caserta Facebook messages
         August 1, 2020 Garbin video
130.
131.
         August 1, 2020 recording
         August 2, 2020 recording
132.
133.
         August 4, 2020 recording
134.
         Luther video
135.
         Picture of tire wall
136.
         Picture of tire wall
         August 9, 2020 Facebook chat
137.
138.
         August 9, 2020 recording
139.
         August 9, 2020 recording
140.
141.
         August 9, 2020 Wire chat
142.
         August 10, 2020 Wire chat
143.
144.
145.
         August 10, 2020 Wire chat
         August 14, 2020 Wire chat
146.
147.
148.
         August 14, 2020 Wire chat
149.
         End of shotgun
150.
151.
         July 19, 2020 Signal chat
152.
         August 16, 2020 recording
         August 16, 2020 recording
153.
154.
         August 16, 2020 Signal chat
155.
156.
         August 17, 2020 Signal chat
157.
158.
         August 17, 2020 recording
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159.
         August 17, 2020 recording
160.
         August 17, 2020 recording
161.
162.
         August 18, 2020 recording
         August 19, 2020 Wire chat
163.
         August 21, 2020 Wire chat
164.
165.
         August 23, 2020 recording
         August 23, 2020 recording
166.
167.
         August 23, 2020 recording
         August 23, 2020 recording
168.
169.
         August 23, 2020 recording
         August 23, 2020 Threema chat
170.
         August 23, 2020 Threema chat
171.
         August 28, 2020 Wire chat
172.
173.
         August 29, 2020 picture of truck at Governor's house
174.
         August 29, 2020 picture of Governor's house
175.
         August 30, 2020 Wire chat
176.
177.
178.
         August 30, 2020 picture of Governor's house
179.
180.
181.
         August 30, 2020 picture of Governor's house
182.
183.
184.
185.
186.
187.
         Fox's map
188.
         Notebook with map
         Photograph of map in notebook
189.
190.
         Slow motion video of Governor's house
191.
         August 29, 2020 photograph of Fox at lake
192.
         August 29, 2020 photograph of Fox at boat launch
193.
         August 29, 2020 photograph of truck at police station
194.
         August 29, 2020 recording
195.
         August 29, 2020 recording
196.
         August 29, 2020 recording
197.
         August 29, 2020 recording
198.
         August 29, 2020 recording
199.
         August 29, 2020 recording
200.
         August 29, 2020 recording
         August 29, 2020 recording
201.
202.
         Red Bull Tavern picture
203.
         August 29, 2020 video of Fox
204.
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205.
206.
207.
208.
         September 4, 2020 Threema chat
209.
210.
         September 4, 2020 Threema chat
211.
212.
213.
         September 4, 2020 Threema chat
214.
215.
         September 7, 2020 recording
         September 7, 2020 recording
216.
         September 7, 2020 recording
217.
         September 7, 2020 recording
218.
219.
         September 11, 2020 recording
220.
         September 11, 2020 recording
221.
         September 2020 recording of Harris and Garbin
222.
         September 11, 2020 recording
223.
         September 11, 2020 recording
         September 12, 2020 explosion video
224.
         September 12, 2020 explosion video
225.
226.
         September 12, 2020 recording
         September 12, 2020 recording
227.
         September 12, 2020 recording
228.
229.
         September 12, 2020 recording
         September 12, 2020 picture of Fox
230.
         Digital scan video of bridge
231.
         Picture of bridge
232.
233.
         Picture of Fox under bridge
234.
         Picture of VFW
235.
         Picture of boat launch
236.
237.
238.
         Map
239.
         Recreation of night-vision signaling
240.
         September 12, 2020 training video
241.
242.
         September 12, 2020 dash cam video
         September 12, 2020 dash cam video
243.
244.
         September 12, 2020 recording
         September 12, 2020 recording
245.
246.
         September 12, 2020 video
247.
248.
         September 12, 2020 recording
         September 12, 2020 recording
249.
         September 12, 2020 recording
250.
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September 12, 2020 recording
September 12, 2020 recording
September 12, 2020 recording
September 12, 2020 recording
September 13, 2020 recording
September 13, 2020 recording
September 13, 2020 recording
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- 256. September 13, 2020 recording
- 257. September 13, 2020 recording
- 258. September 13, 2020 recording
- 259.
- 260. September 13, 2020 recording
- 261. Firework picture
- 262. September 13, 2020 recording
- 263. September 13, 2020 recording
- 264. September 13, 2020 recording
- 265. September 15, 2020 Caserta video
- 266. September 17, 2020 Threema chat
- 267. September 17, 2020 Threema chat
- 268. September 17, 2020 Threema chat
- 269. September 19, 2020 recording
- 270. September 19, 2020 recording
- 271. September 19, 2020 recording
- 272. September 21, 2020 Wire chat
- 273. September 21, 2020 Caserta Facebook message
- 274. September 29, 2020 Caserta video
- 275. September 30, 2020 Caserta video
- 276. September 30, 2020 recording
- 277. September 30, 2020 recording
- 278. September 30, 2020 recording
- 279. October 2, 2020 Threema chat
- 280.
  281. October 2, 2020 Threema chat
- 282. October 3, 2020 Threema chat
- 283. October 2, 2020 taser video
- 284.
- 285. October 7, 2020 Caserta video
- 286. Picture of Confederate flag
- 287. Picture of Confederate flag
- 288. Confederate flag
- 289. Handwritten cypher code
- 290. Black tape
- 291. Pennies and frag
- 292. Metal staples
- 293. Electrical tape
- 294. Paper targets
- 295. Firework
- 296. Gun

- 297. Polymer 80 shipping boxes
- 298. Fireworks mortar launcher
- 299. Night vision goggles
- 300. Tactical kit
- 301. Helmet
- 302.
- 303. Caserta's Hawaiian shirt
- 304. Picture of zip ties
- 305. Zip ties
- 306. Picture of white board
- 307. Picture of closet
- 308. Notebook
- 309. Picture of bag
- 310. Picture of gear
- 311. Picture of books
- 312. Picture of gun
- 313. Picture of gun
- 314. Picture of gun
- 315. Picture of gun
- 316. Assault rifle
- 317. Glock Model 17 Gen 5 pistol
- 318. Picture of flag
- 319. Picture of supply list, cipher, book
- 320. Picture of magazines and holsters
- 321. Picture of plate carrier
- 322. Picture of ammunition
- 323. Hawaiian shirt
- 324. Cell phone
- 325. Plate carrier
- 326. Tactical belt
- 327. Flag
- 328. Picture of tactical belt
- 329. Picture of work locker
- 330.1 October 7, 2020 video of Croft interview part #1
- 330.2 October 7, 2020 video of Croft interview part #2
- 331. Picture of fireworks receipt
- 332. Picture of patches
- 333. Tri-corner hat
- 334. Bag
- 335. Hawaiian shirt
- 336. Glock Model 20 Gen 4 10mm pistol
- 337. Standard Manufacturing 12-gauge shotgun
- 338. Firework
- 339. Red bag and contents
- 340.
- 341. Picture of red bag

342. Picture of contents of red bag 343. Picture of cipher Picture of shotgun and fireworks 344. Picture of smokeless powder 345. Picture of BBs 346. Picture of smokeless propellant 347. Picture of exploding targets 348. Picture of bag from truck 349. 350. Picture of 10mm Glock with extended magazine Picture of Hawaiian shirt 351. 352. Picture of Croft identification in tri-corner hat Picture of bag from truck 353. Picture of bag from truck 354. 355. Picture of bag from truck Picture of bag from truck 356. 357. Extraction from Croft phone – vote meme Extraction from Croft phone – shotgun 358. Extraction from Croft phone – knives 359. Extraction from Croft phone - message 360. Extraction from Croft phone – message 361. 362. Extraction from Croft phone – message 363. 364. 365. Fox's iphone 366. Stun gun Forias Taurus 9mm pistol 367. Palmetto Model PA-15 rifle 368. Hawaiian shirt 369. 370. Picture of kit and boots Picture of weapons 371. Picture of kit 372. 373. Helmet 374. Vest 375. U.S. currency 376. Picture of knives, plans, pistol 377. Handwritten notes 378. Belt 379. Picture of backpack 380. Backpack and contents 381. Picture of plate carrier Picture of plate carrier 382. 383. Picture of rifle Picture of backpack contents 384. 385. Picture of backpack contents Picture of backpack contents 386.

Picture of Hawaiian shirt

387.

- 388. Picture of red tactical bag and magazines
- 389. Picture of M4
- 390. Picture of Hawaiian shirt
- 391. Picture of tactical belt
- 392. Tactical belt
- 393. Glock 19 pistol
- 394. Aero Precision, LLC Model M4E1 rifle with suppressor
- 395. Plate carrier
- 396. Hawaiian shirt
- 397. Night-vision goggles
- 398. Polymer 80 Ghost guns
- 399.
- 400. Ghillie suit
- 401. Anderson Manufacturing 15 short-barreled rifle
- 402. Notebooks
- 403. U.S. currency
- 404. Holster
- 405. Cell phone
- 406. Helmet
- 407. Notes from notebook
- 408. Screenshot from Harris' phone
- 409. Plate carrier
- 410. Backpack
- 411. Tactical belt
- 412. Picture of short-barreled rifle
- 413. Picture of short-barreled rifle
- 414. Picture of Glock pistol
- 415. Picture of Glock pistol
- 416. Harris chat screenshot
- 417.1 Video of Governor's residence
- 417.2 Video of Governor's residence
- 418. Picture of Fox
- 419. Six map screenshots from Fox's phone
- 420. Business card screen capture from Fox's phone
- 421. Video of Fox from cell extraction
- 422. Summary of chat messages
- 423. Garbin picture
- 424. Caserta picture
- 425. Croft picture
- 426. Fox picture
- 427. Franks picture
- 428. Harris picture
- 429. Croft's cell phone
- 430. Firearm
- 431. Harris video
- 432. Harris video

433.	U.S. currency
434.	Cell phone
435.	Fox video
436.	August 28, 2020 Wire message from Fox
437.	Fox Facebook image
438.	III% Facebook image
439.	Picture of contents of red bag from Croft's home
440.	May 7, 2020 Croft Facebook post
441.	June 6, 2020 recording
442.	
443.	September 19, 2020 Threema chat
444.	Fox Facebook messages
445.	FBI recreation of explosion (regular speed)
446.	FBI recreation of explosion (slow)
447.	Picture of firework
448.	Target silhouette
449.	August 28, 2020 Wire message from Fox
450.	Picture of Harris' rifle
451.	Glock 29
452.	Fox's business card
453.	M1938 Russian 7.62 x 54R rifle
454.	Cell phone

Respectfully submitted,

ANDREW BYERLY BIRGE United States Attorney

Date: March 8, 2022 /s/ Jonathan Roth

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